

[law office of Dan Halper PMB 173/249 Smith St. Brooklyn NY 11231] [danhalper@gmail.com][fax (877) 891-8376]

Judge Lawrence M. McKenna  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 1640  
New York, NY 10007

PTAK, GEARE  
08 cv. 147 (LMM)

June 16, 2008

## MEMO ENDORSED

To the honorable Lawrence M. McKenna,

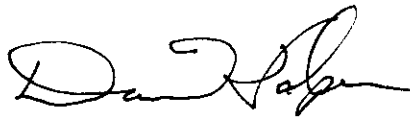
I am writing to you in regard to the status of Federal Action 08-cv-00147 otherwise known as Ptak et. al. v Geare et. al. About a month ago, my client reached a settlement with Mr. Darren Geare (not to be confused with Mr. Riley Geare who is still a defendant in the action.)

At this juncture, my client seeks permission to submit an amended complaint which is already drafted and merely needs to go through a final proofreading and the execution of a new verification. This amended complaint will add two new defendants to the action, Mr. Howard Sadowsky and Ms. Janis Shen who are my client's former attorneys. As was suspected in the original complaint, Mr. Sadowsky and Ms. Shen conspired with another music company which was attempting to recruit the Defendants (who are all rock musicians) while they (Sadowsky and Shen) were purportedly representing the interests of Plaintiffs.

Therefore, Mr. Sadowsky and Ms. Shen played an intrinsic role in the copyright and trademark infringements that ensued from Defendants breach of contract and also committed professional malpractice and tortious interference with prospective economic advantage and of contract.

Sincerely,

Dan Halper, Esq.  
(347) 495-2100



USDC SDNY
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*The Court treats this letter as a motion for leave to serve & file an amended complaint. The motion is granted, and the amended complaint must be filed within 20 days of the date receipt, and all defendants named in the amended complaint must be served, within 120 days of the date of filing, with a summons and a copy of the amended complaint. So ordered.*

*LMH*  
6/16/08